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**REMARKS**

Technology Center 2100

This paper is submitted in complete response to the Final Office Action mailed April 3, 2001, (hereinafter the "Office Action"). Please enter the following remarks into the official files pertaining to the above-titled U.S. patent application. Per this paper, claims 1-21 are pending and are presented for reconsideration.

It is believed that no additional fees are due or owing in regard to the submission of this Response and its attached and related papers. However, if such fees are deemed due, the Office is invited to contact the undersigned at the address and telephone number listed below.

**I. Note Regarding Drawings:**

At paragraph 5 on page 2 of the Office Action, the Examiner indicates that the draftsman objects to the drawing figures originally attached to the patent application on filing in the U.S. Patent and Trademark Office (USPTO).

In response, the Applicant will submit formal drawings upon allowance of the claims of the instant application.

**II. Earlier Amendments to the Specification:**

At paragraph 6 on page 2 of the Office Action, the Examiner indicates that an earlier amendment to the specification was not entered as not understood by the Examiner.

In response, the Applicant has corrected the amendment in question and has presented a new, corresponding amendment to the Specification in this paper. Accordingly, entry of such a new amendment is earnestly solicited. NO NEW MATTER HAS BEEN ADDED.

**III. Claim Rejections – 35 USC § 103(a) USP 6,154,754 to Hsu:**

At paragraph 9, spanning pages 3 through 6 of the Office Action, the Examiner rejects claims 1-21 under 35 USC § 103(a) as allegedly being unpatentable over Hsu et al. (USP 6,154,754 – hereinafter the "Hsu patent"). No secondary references have been relied on by the Examiner in forming the instant rejection. The Examiner puts forth several bases for the instant rejection. In summary, it appears that the Examiner is asserting that it would have been obvious to one of ordinary skill in the art at the time of the invention to have derived the instant claimed

invention based on alleged disclosures made in the Hsu patent. The Examiner's particular assertions are incorporated herein by general reference.

**The Applicant hereby respectfully TRAVERSES the instant rejection and asserts the following remarks.**

The Hsu patent is directed to a system for automatically synthesizing semantic (meaningful) information units from raw material extracted from non-textual documents such as image files, etc. See Abstract. Such semantic information units are also referred to as "Anchorable Information Units" or AIUs and are extracted by Hsu from non-textual documents. See Detailed Description of Hsu patent. According to Hsu, non-textual documents are made up of bit and byte sequences that may be formed using complex compression schemes and which provide very little semantic information of the subject matter defined therein. See Hsu patent at Background section. Hsu seeks to build up semantically rich AIUs from raw information extracted from non-textual documents with graphics and imaging techniques. See Detailed Description of Hsu patent. Once AIUs have been extracted, they may be treated as objects having associated hyperlink references – such hyperlink references may then be traversed within a hypertext environment such as within markup language documents and contexts. Accordingly, the Hsu patent is concerned with extracting objects such as graphic image sections from non-textual documents and treating them as objects which may be processed within an application domain (within an application program, for example) as or like other objects that may otherwise be referenced within textual documents and within hypermedia applications. See Hsu patent at Summary of the Invention. And, although the Hsu patent references error detection and correction, such processing is carried out to ensure that a particular extracted AIU is constructed properly relative to a particular application domain. That is, error correction in the Hsu patent is carried out to ensure that a raw AIU (e.g., an image section of a CAD drawing, for example) may be processed within a particular application domain (e.g., within a SGML environment).

Contrary to the Examiner's assertions, the Hsu patent is completely silent and is not directed in any way to processing textual and other similar rendering or layout source documents as is claimed and contemplated by the instant invention. In fact, Hsu clearly distinguishes between processing textual documents and processing non-textual documents via its AIU extraction systems. FIG. 1 of the Hsu patent and its corresponding discussion therein, for

example, clearly distinguishes between processing textual documents via SGML structures to drive hyperlinking, and processing non-textual documents via AIU extraction techniques (e.g., graphics extraction, etc.) to drive hyperlinking. Furthermore, the Examiner's recognition of the deficiencies of the Hsu patent are completely and totally accurate. That is, the Examiner is exactly correct in asserting: (1) that Hsu fails to teach a scanner accessing an input content stream via a network connection; (2) that Hsu fails to explicitly teach a parsing component coupled to a scanner component for parsing renderable content that includes both malformed and well-formed expressions; and (3) that Hsu fails to disclose a replaceable document type definition being replaceable during execution of a network client; etc. The Examiner has advanced the instant rejection without any reliance on any secondary reference and, instead, has made his assertions of obviousness based on a completely deficient patent reference. With all due respect, the Examiner's assertions of obvious are not based in fact or on law.

There are no references, teachings, or suggestions within the Hsu patent that would have rendered the claimed invention of claims 1-21 obvious to one of ordinary skill in the art. In particular, there are no references within the Hsu patent and by no twisted or tortured reading of the same could one have derived:

A network client, comprising:

a scanner component accessing an input content stream via a network connection to extract renderable content from said input content stream;

a parsing component coupled to said scanner component for parsing said renderable content, said renderable content containing both malformed and well-formed expressions; and

a replaceable document type definition component configured to control said parsing component based on a particular document type definition corresponding to a particular grammar to transform said renderable content into well-formed objects to be processed by a content model based on said particular grammar, said replaceable document type definition component being replaceable during execution of said network client;

as defined by claim 1;

A method for manifesting content received via a network, comprising the following steps:

accessing an input content stream via a network connection to receive renderable content from said input content stream, said renderable content containing both malformed and well-formed expressions;

receiving a replaceable document type definition related to said renderable content;

parsing said renderable content based on said replaceable type definition to generate a well-formed content model; and

manifesting said content model within a data processing environment;

as defined by claim 7; and

A method of using a personal computing system equipped with a network client, comprising the following steps:

executing a network client to access an network server system to receive data therefrom, said network client including a scanner component for accessing said network server to receive an input content stream and to extract renderable content from said input content stream, a parsing component coupled to said scanner component for parsing said renderable content, and a replaceable document type definition component configured to control said parsing component based on a particular document type definition corresponding to a particular grammar, said replaceable document type definition component being replaceable during execution of said network client, said renderable content containing both malformed and well-formed expressions;

causing said scanner component to access said input content stream via a network connection to extract said renderable content therefrom;

receiving said replaceable document type definition related to said renderable content via said network connection;

causing said parsing component to parse said renderable content to transform said renderable content into well-formed objects based on said replaceable type definition to generate a content model; and

manifesting said content model within said personal data processing system;

as defined by claim 13.

In fact, such rendering and layout source documents, in accordance with the instant invention, have expressions such as HTML expressions, etc., that are processable by way of parsing techniques in accordance with a processing scheme based upon a given expression grammar. For example, the present invention permits parsing of source documents for well-formed and malformed expressions based on HTML and other grammars. And, such grammars define document type definitions which may be substituted, added, or removed during runtime of an application system – totally missing in the Hsu patent.

As claims 1, 7, and 13, as amended to date, are clearly patentable over the cited Hsu patent, so too are the claims that depend therefrom including 2-6, 8-12, and 14-21 for the same reasons presented above.

Thus, for the foregoing reasons, it is respectfully asserted that the present invention, as defined by claims 1-21 is clearly distinguishable and therefore patentable over the Hsu patent under 35 USC § 103(a). Accordingly, it is earnestly requested that the Examiner's rejection be withdrawn and that claims 1-21 be allowed to issue in a U.S. Patent.

#### **Conclusions**

This paper is submitted in complete response to the Final Office Action mailed April 3, 2001. Per this paper, claims 1-21 are pending in the application and are presented for reconsideration, which action is earnestly requested.

It is believed that no additional fees are due or owing in regard to the submission of this paper and its attached and related papers. However, if such fees are deemed due, the Office is invited to contact the undersigned at the address and telephone number listed below.

Respectfully submitted,

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